EPA’s Role in Stimulating Recycling Markets and Creating Demand

Cheryl Coleman, Director
Resource Conservation and Sustainability Division, US EPA

June 10, 2020
Importance of the U.S. Recycling System

• Recycling provides valuable feedstock to the manufacturing sector.
• Recycling creates jobs! EPA estimates that 757,000 jobs and $36.6 billion in wages result from recycling.
• EPA’s America Recycles Initiative launched in November 2018.
U.S. Recycling System Challenges

- Consumer confusion about how to recycle properly
- Investments needed in processing infrastructure
- Lack of domestic markets
- Align data to measure recycling system performance.
National Framework for Advancing the U.S. Recycling System

Promoting education and outreach

Enhancing materials management infrastructure

Strengthening secondary materials markets

Enhancing measurement
EPA’s Role

Provide National Leadership
- Implement the *National Framework to Advance the U.S. Recycling System*
- Develop a national recycling strategy and national recycling goal(s)

Support State and Local Governments
- Public Service Announcements on recycling “right” during COVID-19
- Update EPA’s *Measuring Recycling: A Guide for State and Local Governments*

Enhance Supply and Demand of Recyclables
- Hold regional and state market development workshops
- Promote preferred procurement of recycled content products
THANK YOU!

To learn more about America Recycles, please visit

https://www.epa.gov/americarecycles
APR’s Recycling Demand Champion Campaign & PCR Certification Program

Steve Alexander, APR President & CEO
WHO IS APR?

International trade association

The Voice of Plastics Recycling®

Companies committed to the success of plastics recycling
Increase Supply
Enhance Quality
Expand Demand
Communicate Value

APR Primary Goals
WHAT DO WE DO?

- APR Design® Guide for Plastics Recyclability
- Training
- Advocacy
- APR Recycling Demand Champions
- PCR Certification
- Resource Development
- Education
“Given the current fragile recycling economics, a demand-pull for recycled plastics... is needed to start building positive momentum in the near term.”

Ellen MacArthur Foundation
• Strengthen & *increase domestic demand*

• Boost a *circular economy* for plastic recycling

• Help prevent “*ocean plastics*” by stimulating domestic markets

• *Mitigate reliance* on export markets
Champions Commit to *increase* their PCR use in coming year

Any *new* use of domestic PCR qualifies
Let’s Get Started!

Participating in this critical program is simple.

**STEP 1**

**SIGN COMMITMENT LETTER**

APR Recycling Demand Champion Pledge – I will be an APR Recycling Demand Champion!

"I commit to participate in the APR Recycling Demand Champion Program to drive PCR use of broad specification PCR. I will provide an initial list of future actions to the APR within 60 days and timely report progress so positive impacts may be anonymously aggregated and collectively reported. I believe demand creates value and value drives recycling."  


**STEP 2**

**OPTION A – CHOOSE PCR CONTAINING ITEM(S) TO PURCHASE**

Everyday use/catalog order items are easily available and actively being used. Examples include:

- trash bags
- mop buckets
- trash cans
- totes
- recycle bins
- safety signs

Also, many companies are purchasing WIP (work-in-process) items:

- pallets
- collapsible pallets
- crates
- totes
- large liquid containers

For vendors, visit: https://plasticsrecycling.org/recycling-demand-champions/vendors

**OPTION B – EXPAND YOUR CURRENT USE OF PCR**

Increase the amount of PCR in a current product or application, or develop a new product or application for PCR.

**STEP 3**

**PURCHASE & REPORT ITEM(S)**

Within 12 months of becoming a Demand Champion purchase or manufacture your PCR containing item(s) and report to APR. All data submitted to APR will remain confidential. NDAs can be executed upon request.

**ONGOING**

**PROMOTION & RECOGNITION**

Your company's prominent role in expanding the markets for mixed residential plastics will be actively promoted by APR. Visit https://plasticsrecycling.org/recycling-demand-champions for a list of current Demand Champions and the far-reaching press the program has received.

APR is available to assist Champions to develop their work plan; please contact Liz Bedard (lbedard@aprsociety.org) for support. APR will consolidate Champions’ year-end data to determine total market impact and, at a minimum, produce an Annual Report.
2018

10 Companies

THE INAUGURAL DEMAND CHAMPIONS

Berry
Champion
Coca-Cola
Envision Plastics
Keurig DrPepper
Merlin Plastics
Plastipak Packaging
P&G
Target

6.8 MILLION POUNDS OF POSTCONSUMER RESINS

INCREASED THEIR PCR PURCHASING OVER THE LAST 12 MONTHS BY:

PCR USES INCLUDE:
- GAYLORD LINERS
- GAYLORDS
- PACKAGING
- TIER/SIP SLIP SHEETS
- TRASH BAGS

RESULTING IN THESE ESTIMATED IMPACTS

GREENHOUSE GAS EMISSIONS FROM 1,747 PASSENGER VEHICLES DRIVEN FOR 1 YEAR

JOB CREATION IN PLASTIC RECYCLING FOR 92 PEOPLE

ALL THE PLASTIC RECYCLABLES FROM A CITY THE SIZE OF CAMBRIDGE, MASSACHUSETTS (113,333 POPULATION)

THE APR DEMAND CHAMPIONS - STRENGTHENING AND INCREASING DOMESTIC DEMAND FOR RESIDENTIAL MIXED PLASTICS

Data sources:
- EPA WARM Model
- Private consultants/industry experts
- **The Recycling Partnership
2019

20 Companies
PCR Certification Program Overview
What is the problem?

**Supply**: Reclaimers have PCR for sale but see their competitors passing off PIR as PCR

**Demand**: Brand Owners looking to buy PCR but skeptical of getting 1-2 drastically lower bids

When both sides need the same thing, this is an industry problem.
What is it the solution? *Certified PCR*

- Provides confidence that endorsed certification companies adhere to a **clear, consistent definition of PCR**.
- Helps **level the playing field** by endorsing multiple, credible third-party certifying bodies.
- Increases **accessibility & confidence** in certification across a diversity of PCR applications.
How does the PCR Certification Program work?

1. APR endorses third-party companies to conduct certifications.

2. Plastics reclaimers hire APR endorsed companies to conduct certification.

3. APR promotes program and certified PCR from APR members.
How does APR endorse the certifying companies?

• Use ISO 14021:2016 definition for PCR
  • Material generated by households or commercial, industrial and institutional facilities,
  • in their role as end-users of the product,
  • which can no longer be used for its intended purpose.
  • This includes return of material from the distribution chain.

• Adhere by operating procedures
  • Required documentation
  • Mass Balance Analysis
  • Recycled Content Calculation
  • Annual Recertification Process
  • Site Visit

• Three-year endorsement
What does the PCR Certification program not include?

- APR does not certify PCR content; APR is not the certifier.
- Program is focused on the PCR pellet, flake, regrind and not products (yet!)
- PIR
- APR does not adjudicate “percentage of PCR content” disagreements.
- APR membership not a requirement
- APR does not collect a fee
- Application info remains confidential
But what if we didn’t think of something?

A five-person Technical Support Group will arbitrate issues of concern.

1. APR Plastic Reclaimer
2. APR Board Member
3. APR-endorsed Certifying Company
4. Brand Owner
5. EPA Representative
I’m a reclamer – how do I get my PCR certified?

<table>
<thead>
<tr>
<th>Company</th>
<th>Contact</th>
<th>Email</th>
<th>Phone</th>
</tr>
</thead>
<tbody>
<tr>
<td>AM Testing &amp; Services, Inc.</td>
<td>Roger Matilla</td>
<td><a href="mailto:Roger@AMTesting.com">Roger@AMTesting.com</a></td>
<td>(708) 807.5252</td>
</tr>
<tr>
<td></td>
<td>Bill Baumann</td>
<td><a href="mailto:BBaumann@AMTesting.com">BBaumann@AMTesting.com</a></td>
<td></td>
</tr>
<tr>
<td>SCS Global Services</td>
<td>Nicole Munoz</td>
<td><a href="mailto:NMunoz@scsglobalservices.com">NMunoz@scsglobalservices.com</a></td>
<td>(510) 452-8031</td>
</tr>
<tr>
<td>UL Verification Services Inc.</td>
<td>Bill Hoffman</td>
<td><a href="mailto:bill.hoffman@ul.com">bill.hoffman@ul.com</a></td>
<td>(847) 664-1112</td>
</tr>
</tbody>
</table>
I’m looking for certified PCR – how do I find it?
Overview of Comprehensive Procurement Guideline Program

• Government buy-recycled program

• Authorized by the Resource Conservation and Recovery Act (RCRA), Section 6002

• Harnesses federal purchasing power to stimulate the demand for recovered materials

• Applies to procuring agencies using appropriated federal funds

• Widely referenced by government, universities, NGOs and the private sector
EPA’s Federal-Procurement Roles under RCRA

• Under the statute, EPA has three responsibilities:
  • To designate items that are or can be made with recovered materials
  • To recommend procurement practices to assist procuring agencies
  • To provide information on recovered material content
EPA Roles, cont’d

• In Comprehensive Procurement Guidelines (CPGs), EPA designates items that are or can be made with recovered materials

• In Recovered Materials Advisory Notices (RMANs), EPA recommends procurement practices and provides information on recovered material content
Procuring Agency Responsibilities

- **Procuring agencies** must purchase designated items with highest percentages of recovered material practicable.
- **Exceptions** include items that:
  - Are not reasonably available within a reasonable time
  - Fail to meet the performance standards
  - Are only available at unreasonable price

Sources of requirements to follow CPGs:

- **RCRA statute**, which directs federal agencies to revise specifications, and develop policies and procedures to maximize the use of recovered materials.
- **Executive Orders**
EPA Process to Designate Items and Issue Procurement Recommendations

A bifurcated process

• Designating items in a CPG is a rulemaking activity
  • CPGs are regulations and are codified

• RMANs are published in Federal Register notices for public comment
  • RMANs are guiding recommendations and are not codified
Process, cont’d

• Process for codifying designations and publishing recommendations in the notices section of the Federal Register (FR) is defined
Where We Are Today

https://www.epa.gov/cpg
EPA’s main CPG-program webpage

- EPA issued five CPGs designating 61 items in eight distinct product categories
- EPA also published recommendations on purchasing designated items in RMANs
Today, cont’d

In the main CPG-program webpage, EPA also provides the CPG Product Supplier Directory – an additional way EPA attempts to help procuring agencies buy recycled-content products.

• EPA is supporting procurement agency purchasing in two other ways:

  1. **CPG Product Supplier Directory** that lists manufacturers, vendors, and suppliers for each item designated in CPGs
     • While the directory does not provide pricing, the contact information enables buyers to comparison-shop for informed purchasing decisions

  2. **ReCon Tool** that calculates GHG emission and energy use benefits of alternative recycled content purchasing decisions
Example Designation and Recommendation

- **Postconsumer Recovered Material** - material or finished product that:
  - Served its intended use
  - Is diverted from disposal
  - Has completed life as a consumer item

- **Recovered Material** - material or byproduct diverted from waste
  - Excludes material commonly reused within an original manufacturing process

<table>
<thead>
<tr>
<th>PARK &amp; RECREATION PRODUCT¹</th>
<th>MATERIAL</th>
<th>POST-CONSUMER RECOVERED CONTENT²</th>
<th>TOTAL RECOVERED CONTENT²</th>
</tr>
</thead>
<tbody>
<tr>
<td>Park Benches and Picnic Tables</td>
<td>Plastic³</td>
<td>90–100%</td>
<td>100%</td>
</tr>
<tr>
<td></td>
<td>Plastic Composites</td>
<td>50–100%</td>
<td>100%</td>
</tr>
<tr>
<td></td>
<td>Aluminum</td>
<td>25%</td>
<td>—</td>
</tr>
<tr>
<td></td>
<td>Concrete</td>
<td>—</td>
<td>15–40%</td>
</tr>
<tr>
<td></td>
<td>Steel⁴</td>
<td>16%</td>
<td>25–30%</td>
</tr>
<tr>
<td></td>
<td></td>
<td>67%</td>
<td>100%</td>
</tr>
<tr>
<td>Plastic Fencing for Specified Uses³</td>
<td>Plastic</td>
<td>60–100%</td>
<td>90–100%</td>
</tr>
<tr>
<td>Playground Equipment</td>
<td>Plastic³</td>
<td>90–100%</td>
<td>100%</td>
</tr>
<tr>
<td></td>
<td>Plastic Composites</td>
<td>50–75%</td>
<td>95–100%</td>
</tr>
<tr>
<td></td>
<td>Steel⁴</td>
<td>16%</td>
<td>25–30%</td>
</tr>
<tr>
<td></td>
<td></td>
<td>67%</td>
<td>100%</td>
</tr>
</tbody>
</table>
Moving Forward

• Existing CPGs/RMANs were last updated in 2007
• **EPA is requesting comments** on the existing CPGs and RMANs via an FR non-rulemaking notice
• The FR notice will:
  • Increase awareness of government buy-recycled procurement programs
  • Give voice to stakeholders and the public
  • Assist the Agency with determining whether a future rulemaking is appropriate

Buying recycled products...
...fosters the recycling of materials
...stimulates recycling markets
...strengthens local economies
...strengthens the US’ recycling system

**Plus, it...**
...conserves natural resources
...saves energy
...reduces solid waste
...reduces air and water pollutants
...reduces greenhouse gases
...creates new jobs
THANK YOU!
Judy Sheahan
Assistant Executive Director
The US Conference of Mayors and
Managing Director
Municipal Waste Management Association
Who We Are

The U.S. Conference of Mayors
• Established in 1932
• Cities with Populations of 35,000 or more
• 1,400 Mayors Throughout the United States

The Municipal Waste Management Association
• Established in 1982
• Solid Waste, Public Works, Recycling Professionals in Cities, Counties, States, and Authorities
Recent Headlines

• As Costs Skyrocket, More Cities Stop Recycling
• Increased Costs Could Halt Curbside Recycling. Keeping It Will Cost You
• Cleveland Recycling on Hold
• The latest coronavirus side effect: Lots more curbside trash, but less recycling
Cities Believe in Recycling
Why Is Recycling Important to Cities?

- Good for Overall Environment and Public Health Goals
- Extend Landfill Capacity
- Assists Sustainability Efforts
- Components of GHG Reduction Strategy
- Citizens Demand It
What We Need?

MARKETS, MARKETS, MARKETS

CONSUMER EDUCATION
MRF Contamination Rates
(Source: Waste Management)
How Federal Procurement Assists Our Efforts

Federal Government is a Major Purchaser of Goods

Provides Guidance to Many Local and State Governments to Establish Similar Procurement Policies

Results in More Purchasers - Large and Steady Customer for Goods

Private Sector Investments
The Federal Government Role in Procurement and Recycling Markets

- **Executive Order 12873** - Federal Acquisition, Recycling and Waste Prevention (1993)


Real World Example – How Federal Policies Impacted Recycling

• Federalism Executive Orders
• USCM Buy Recycled Campaign
• USCM National Office Paper Recycling Project
• Private Sector Investments
• Upgraded Technology
Other Helpful Federal & Congressional Actions

- Education
- Investment
- Good Mandates
The Role of the Private Sector

Manufacturers and the Business Community

- Design Products that -
  - Minimizes Packaging
  - Truly Recyclable (i.e. Don’t Call It Recyclable Unless Most Communities Can Easily Recycle It)
  - Use Post Consumer Content Materials

- Policy to Buy Post-Consumer Content Products

- Assist with Educating Consumers
Concluding Thoughts
About Comprehensive Procurement Guideline FR Notice

Ksenija Janjic
Office of Resource Conservation and Recovery, US EPA

June 10, 2020
• Today, in Federal Register Notice, 85 FR 19473, EPA is seeking public comment on the existing CPG designations and RMAN recommendations
  • Opened on April 7th
  • Will close July 6th
FR Notice: Topic Areas and Questions

• Designated Items:
  • Based on procuring agencies purchases, are the right items designated?
  • Do the items currently designated represent items that procuring agencies purchase?
  • Should items be deleted, added or modified? Why?

• Procurement Recommendations:
  • Are the recommended recovered content levels/ranges appropriate?
    • If not, please provide appropriate levels.
  • Are the published specifications appropriate?
    • If not, please provide appropriate specifications.
Where to Find Existing Documents

Federal Register Notices Related to the Guidelines for Procurement of Products Containing Recovered Materials

<table>
<thead>
<tr>
<th>DESIGNATION/ RMAN</th>
<th>DATE PUBLISHED</th>
<th>FEDERAL REGISTER</th>
<th>ACTION TAKEN</th>
<th>Technical Background Documents</th>
<th>Other Supporting Documents</th>
</tr>
</thead>
</table>

https://www.epa.gov/smm/regulatory-background-comprehensive-procurement-guideline-program-cpg
Includes links to FR notices and supporting documents, and information about CPG revisions and RMAN updates
## Designations in CPG I

<table>
<thead>
<tr>
<th>PRODUCT CATEGORY</th>
<th>ITEM</th>
</tr>
</thead>
<tbody>
<tr>
<td>CONSTRUCTION</td>
<td>Cement and Concrete*, Structural fiberboard, Laminated paperboard, Building insulation, Carpet*, Floor tiles, Patio blocks</td>
</tr>
<tr>
<td>LANDSCAPING</td>
<td>Hydraulic mulch, Yard trimmings compost*</td>
</tr>
<tr>
<td>NON-PAPER OFFICE</td>
<td>Office recycling containers, Office waste receptacles, Plastic desktop accessories, Remanufactured toner cartridges, Binders, Plastic trash bags</td>
</tr>
<tr>
<td>PAPER</td>
<td>Paper and Paper products</td>
</tr>
<tr>
<td>PARK &amp; RECREATION</td>
<td>Playground surfaces, Running tracks</td>
</tr>
<tr>
<td>TRANSPORTATION</td>
<td>Traffic barricades, Traffic cones</td>
</tr>
<tr>
<td>VEHICULAR</td>
<td>Engine coolants, Re-Refined lubricating oils, Retread tires</td>
</tr>
</tbody>
</table>

* Item’s designation revised or updated in a subsequent CPG
# Designations in CPG II

<table>
<thead>
<tr>
<th>PRODUCT CATEGORY</th>
<th>ITEM</th>
</tr>
</thead>
<tbody>
<tr>
<td>CONSTRUCTION</td>
<td>Shower and restroom dividers/partitions, Consolidated and reprocessed latex paint for specified uses</td>
</tr>
<tr>
<td>LANDSCAPING</td>
<td>Garden and soaker hoses, Lawn and garden edging</td>
</tr>
<tr>
<td>NON-PAPER OFFICE</td>
<td>Printer ribbons, Plastic envelopes</td>
</tr>
<tr>
<td>PARK &amp; RECREATION</td>
<td>Plastic fencing for specified uses</td>
</tr>
<tr>
<td>TRANSPORTATION</td>
<td>Parking stops, Traffic control devices (Channelizers, Delineators, Flexible Delineators)</td>
</tr>
<tr>
<td>MISCELLANEOUS</td>
<td>Pallets</td>
</tr>
</tbody>
</table>

**CPG II, 62 FR 60962**
### Designations in CPG III

<table>
<thead>
<tr>
<th>PRODUCT CATEGORY</th>
<th>ITEM</th>
</tr>
</thead>
<tbody>
<tr>
<td>CONSTRUCTION</td>
<td>Carpet cushion, Flowable fill, Railroad grade crossing surfaces*</td>
</tr>
<tr>
<td>LANDSCAPING</td>
<td>Food waste compost*, Plastic lumber landscaping timbers and posts</td>
</tr>
<tr>
<td>NON-PAPER OFFICE</td>
<td>Solid plastic binders, Plastic clipboards, Plastic file folders, Plastic clip portfolios, Plastic presentation folders</td>
</tr>
<tr>
<td>PARK &amp; RECREATION</td>
<td>Park benches, Picnic tables, Playground equipment</td>
</tr>
<tr>
<td>MISCELLANEOUS</td>
<td>Sorbents, Industrial drums, Awards and plaques, Mats, Signage including sign supports and posts, Manual-grade strapping</td>
</tr>
</tbody>
</table>

* Item’s designation revised or updated in a subsequent CPG
## Designations in CPG IV

<table>
<thead>
<tr>
<th>PRODUCT CATEGORY</th>
<th>ITEM</th>
</tr>
</thead>
</table>
| CONSTRUCTION     | **New:** Modular threshold ramps, Nonpressure pipe, Roofing materials  
**Revised:** Cement and Concrete, Railroad grade crossing surfaces, Polyester carpet |
| NON-PAPER OFFICE | Office furniture |
| VEHICULAR        | Rebuilt vehicular parts |
| MISCELLANEOUS    | Bike racks, Blasting grit |

**CPG IV, 69 FR 24028**
### Designations in CPG V

<table>
<thead>
<tr>
<th>PRODUCT CATEGORY</th>
<th>ITEM</th>
</tr>
</thead>
<tbody>
<tr>
<td>LANDSCAPING</td>
<td></td>
</tr>
<tr>
<td></td>
<td><strong>New:</strong> Fertilizer</td>
</tr>
<tr>
<td></td>
<td><strong>Revised:</strong> Compost made from recovered organic materials</td>
</tr>
</tbody>
</table>
## Recommendations in RMANs

RMANs generally align with CPGs, but recommendations for several items may fall in their own RMAN or may have been updated in subsequent RMANs.

<table>
<thead>
<tr>
<th>ITEM</th>
<th>ORIGINAL</th>
<th>UPDATED</th>
</tr>
</thead>
<tbody>
<tr>
<td>Paper</td>
<td>Paper RMAN I</td>
<td>Paper RMAN II</td>
</tr>
<tr>
<td>Floor tile</td>
<td>RMAN I</td>
<td>RMAN II</td>
</tr>
<tr>
<td>Plastic batt building insulation</td>
<td>RMAN I</td>
<td>RMAN I Update</td>
</tr>
<tr>
<td>Steel shower and restroom dividers/partitions, Steel components of traffic barricades and delineators</td>
<td>RMAN II</td>
<td>RMAN III</td>
</tr>
<tr>
<td>Steel recycling containers, Steel waste receptacles</td>
<td>RMAN I</td>
<td>RMAN III</td>
</tr>
<tr>
<td>Cement and concrete, Polyester carpet</td>
<td>RMAN I</td>
<td>RMAN IV</td>
</tr>
<tr>
<td>Railroad grade crossing surfaces</td>
<td>RMAN III</td>
<td>RMAN IV</td>
</tr>
<tr>
<td>Compost</td>
<td>RMAN I &amp; RMAN III</td>
<td>RMAN V</td>
</tr>
</tbody>
</table>
## Where to Find Regulatory Documents: Summary

<table>
<thead>
<tr>
<th>CATEGORY</th>
<th>DESIGNATIONS</th>
<th>RECOMMENDATIONS</th>
</tr>
</thead>
<tbody>
<tr>
<td>CONSTRUCTION</td>
<td>CPGs I, II, III &amp; IV</td>
<td></td>
</tr>
<tr>
<td>NON-PAPER OFFICE</td>
<td>CPGs I, II, III &amp; IV</td>
<td></td>
</tr>
<tr>
<td>PAPER</td>
<td>CPG I</td>
<td></td>
</tr>
<tr>
<td>PARK &amp; RECREATION</td>
<td>CPGs I, II &amp; III</td>
<td></td>
</tr>
<tr>
<td>TRANSPORTATION</td>
<td>CPGs I &amp; II</td>
<td></td>
</tr>
<tr>
<td>VEHICULAR</td>
<td>CPGs I &amp; IV</td>
<td></td>
</tr>
<tr>
<td>MISCELLANEOUS</td>
<td>CPGs II, III &amp; IV</td>
<td></td>
</tr>
</tbody>
</table>

How to Develop a Comment: General Pointers

• Read and understand the document you are commenting on
• Follow directions
• Be concise but support your claims
• Base your comments on sound reasoning and scientific evidence
• Address trade-offs and opposing views
• One well-supported comment is more informative than a thousand form letters
• Submit by the comment period deadline
• Follow rules and restrictions

https://www.epa.gov/dockets/commenting-epa-dockets
provides general guidance on making effective comments
How to Develop a Comment: Designations

1. Based on procuring agencies purchases, are the right items designated?
2. Do the items currently designated represent items that procuring agencies purchase?
3. Should items be deleted, added or modified? Why?

EPA’s Designation Criteria:

• **Use of Materials Found in Solid Waste**
  • Is the item made using a material that represents a significant portion of the solid waste stream?

• **Economic and Technological Feasibility and Performance**
  • Does the item perform as well as necessary to meet a procuring agency’s needs?
  • Are there government, ASTM or other consensus standards or specifications that would enable a procuring agency to buy the item containing recovered materials?
  • Is the item available at a reasonable price considering normal market fluctuations?
EPA’s Designation Criteria cont’d:

- **Impact of Government Procurement**
  - Is the item purchased in appreciable quantities by the Federal government or by state and local governments?

- **Availability and Competition**
  - Is the item available from an adequate number of sources to ensure competition?
  - Is the item generally available, rather than available in a limited market area?

- **Other Uses for Recovered Materials**
  - Will recovered materials be diverted from one product to another, creating offsets and/or shortages?
  - Can manufacturers obtain recovered materials in sufficient quantity to produce the item(s)?

- **Other Considerations**
  - Is the relative price of an item with recovered materials content significantly higher than the relative price of a comparable virgin product?
  - Can it be shown that an item meets all of EPA's selection criteria? (E.g., insufficient information may be available for experimental or developmental products)
How to Develop a Comment: Recommendations

1. Are the recommended recovered content levels/ranges appropriate? If not, please provide appropriate levels.
2. Are the published specifications appropriate? If not, please provide appropriate specifications.

Information Used by EPA:

- **Recovered material content levels**
  - What levels of recovered materials content are used in the product?
  - Is the recovered materials content postconsumer material? What percentage is postconsumer?

- **Sources**
  - What is the source of the information provided (e.g., industry studies, technical journals)?
  - Where can purchasing agencies purchase the item (with vendor’s company name, address, contact name and phone number)?
How to Submit a Comment

https://www.epa.gov/cpg
EPA’s main CPG-program webpage links to the FR Notice

Comprehensive Procurement Guideline (CPG) Program

The Comprehensive Procurement Guideline (CPG) program is part of EPA’s Sustainable Materials Management initiative that promotes a system approach to reducing materials use and the associated environmental impacts over the materials’ entire life cycle.

The CPG program is authorized by Congress under Section 6002 of the Resource Conservation and Recovery Act (RCRA) (42 U.S. Code 6962).

CPG continues the effort to promote the use of materials recovered from the municipal solid waste stream. Buying products made with recovered materials ensures that the materials collected in recycling programs will be used again in the manufacture of new products. There are 61 products designated in eight categories.
The FR Notice webpage provides a button for quick online comment submission.
Once You Have Submitted a Comment

• EPA will review all comments received and determine next steps
• Any future revisions to the CPG or RMANs will be noticed in the Federal Register
• EPA will also make every attempt to alert the public when an action is forthcoming